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Federal Communications Commission
Mass Media Bureau
Washington, D.C.

RE: MM docket 99-25 (Low power FM radio proposal)
2/11/1999

Dear Sirs:

I wish to thank you for noticing the public=s interest in establishing a low power F.M. service. It has been evidenced in many forms, such as the interest in your low power web site and unfortunately as the high number of illegal transmitters that the commission has had to terminate.

With the high cost of establishing a legal F.M. station many individuals wishing to get into Broadcasting, have resorted to illegal stations.

The low power F.M. service has the potential to become the training ground for many of the future disk jockeys, station engineers, and station managers of high powered stations .

Low power F.M. will also provide much needed service to rural areas. As high powered stations have consolidated there has been desire to purchase rural stations surrounding urban metropolitan areas and refocus their programming away from the rural area toward the urban area. This essentially leaves a void in these communities. The low power service will fill this void.

High power F.M. allotments do not always conform to community area terrains. There are lots of rural areas that need F.M. service that can not get an F.M. allotment because of , as the crow flies, mileage restrictions. Many of these communities are in valleys, hills, and mountains of which the local terrain blocks the F.M. signal. The Low Power F.M. service would allow relief to these communities.

1. Classes. I concur with your establishment of LP1000, LP100 classes. I suggest that the Amicroradio@ class just be called LP10.

A. LP1000 should be a Aprimary@ service and conform to technical parameters of a higher powered Aclass A station@.

B. LP100 and LP10 should be a Asecondary@ type of service.

C. All classes should be allowed to also provide engineering data to the commission to amend contour areas to compensate for terrain height, blockage and other items. Reduced E.R.P. levels should be allowed for mountainous or hilly terrain with high H.A.A.T.

2. Interference. I concur to your standards for interference protection criteria, however I would ask that you would give the applicant the option to provide engineering data to the commission regarding spacing and interference so as to help the rural areas that may have varied terrain.

3. Emissions and Bandwidth. LP1000 should conform to AClass A@ standards. LP-100 and LP10 should have lower standards, similar to

"Translators". All of this equipment should be type excepted by the Commission. NONE of it should be "build your own".

A. Furthermore, I recommend that a F.C.C. General class license be held to repair any of LP-1000, LP100, or LP-10 transmitters.

4. Ownership and Eligibility. I concur to most of your ownership rules, however I suggest that in the rural areas that cross ownership between high and low power might be in the public interest, especially the LP-100 and LP-10 classes. Since the current rules prohibit translators of high power stations, to be owned by those stations, many rural areas having terrain blockage can not be served by a local station.

5. Service Characteristics.

A. Local Programming. I suggest that it be allowed to re-transmit the programming of High power stations in rural areas only. Low power F.M. will serve the public interest if it can provide the best programming at the least cost. Rural areas in particular can not afford to hire personnel to program "all day". The re-transmission of programming will be in the public interest. We also recommend that LP-100 and LP-10 classes have no restrictions on the re-broadcast of LP-1000, LP-100 and LP-10 programming in the rural areas.

B. Commercial Programming. We concur regarding commercial advertising, and that you must generate revenue to remain in operation. We also concur of requiring the LP-1000 class to conform to the Part 73 requirement regarding "Public Interest".

C. Operating Hours. We concur that LP-1000 should conform to "class A" hours. We suggest that LP-100 and LP-10 not have specific hours "mandated". We also note that if "Auxiliary sources" of programming is available for re-transmission that many of the Low Power F.M. stations would be able to broadcast longer.

D. Construction, License terms, Sales, and Renewals.

1. We concur on the Commission=s construction periods, We suggest that extensions can be made available under "common sense" hardships.

2. Licenses should be for either five (5) or ten(10) year terms with renewal.

3. We concur with the commission regarding the sale of Low Power F.M. classes.

E. Emergency Alert System. We concur with the commission regarding E.A.S. and LP-1000 stations.

F. Call signs. We have no preference on type of call sign system.

G. Filing applications. We suggest that Electronic filing not be Mandatory. We have a concern of transferring filing fees over the INTERNET and of not having a "Certified acknowledgment slip" from the Commission, of any important transactions. We highly do not recommend the use of auctions to select Low Power F.M. licensees. This would not be in the Public Service for this Class.

We further recommend that a F.C.C. General Class license be "On Staff" at LP-1000 stations and all operators have F.C.C. Third class licenses. A F.C.C. Third Class license should be required "On staff" or "Designated"

for the LP-100 and LP-10 classes. This will help promote conformity in the F.C.C. regulations and professionalism.